

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	CRIMINAL ACTION 16-22-5
)	
v.)	
)	
LUCY XI)	
)	

**DEFENDANT LUCY XI'S MOTION FOR LEAVE
TO FILE UNDER SEAL**

Defendant Lucy Xi, by and through undersigned counsel, hereby moves the Court pursuant to Local Rule 5.1.2 for permission to file under seal Ms. Xi's Motion for Appointment of Counsel Under the Criminal Justice Act and Ms. Xi's accompanying Financial Affidavit (the "CJA Motion"), and states the following in support thereof:

1. The above-captioned matter is a criminal action.
2. The CJA Motion requires sealing as it is unrelated to the merits of this case and is related to the continued representation of Ms. Xi and Ms. Xi's assurance of counsel pursuant to the Sixth Amendment of the U.S. Constitution.

WHEREFORE, Ms. Xi respectfully requests that the Court permit the filing of the CJA Motion under seal.

Dated: November 17, 2021

Respectfully submitted,

/s/ Eric L. Yaffe
Eric L. Yaffe, Esq. (*pro hac vice*)
Frank J. Sciremammano, Esq. (*pro hac vice*)
Lathrop GPM LLP
The Watergate – Suite 700
600 New Hampshire Avenue, NW
Washington, DC 20037
Attorneys for Defendant Lucy Xi

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the foregoing was transmitted to the Court's CM/ECF system for electronic service upon counsel for all parties of record.

Dated: November 17, 2021

/s/ Eric L. Yaffe
Eric L. Yaffe (*pro hac vice*)